

James W. Perkins, Esq. (212) 801-3188 perkinsj@gtlaw.com

April 29, 2019

BY ECF AND FAX

Honorable Alvin K. Hellerstein United States District Judge United States District Court Southern District of New York 500 Pearl Street, Suite 1050 New York, New York 10007

Tel: (212) 805-0152 Fax: (212) 805-7942

Re: Vera v. The Republic of Cuba, et al.

12 Civ. 1596

Dear Judge Hellerstein:

We are co-counsel to Petitioner Jeanette Fuller Hausler ("Mrs. Hausler") and William Fuller as co-representatives of the Estate of Robert Otis Fuller. By letter dated January 28, 2019, we advised the Court that Mrs. Hausler had passed away and that we would be moving for leave to substitute a Petitioner in her place within 90 days which time runs today. Federal Rules of Civil Procedure ("FRCP") Rule 25(a). Mrs. Hausler was a Florida resident and we are still working with Florida counsel to make the appropriate substitution.

We, therefore, submit this letter to request that, pursuant to FRCP 6(b)(1)(A), the Court grant a short extension of 18 days, to May 17, 2019, to file the motion for leave to substitute. This is the first request for an extension of time. Counsel for Banco Bilbao Vizcaya Argentaria, S.A. has consented to this extension.

Accordingly, we respectfully request that the Court grant an extension to file the Rule 25 motion to May 17, 2019.

Should the Court have any questions about this application, we are available to confer at the Court's earliest convenience.

Respectfully submitted,

James W. Perkins

cc: All Counsel of record (by ECF)